



LAND MOBILE COMMUNICATIONS COUNCIL

Writer's Address and Telephone Number:

ITA
Suite 500
1110 N. Glebe Road
Arlington, VA 22201-5720

EX PARTE OR LATE FILED

Tel: (703) 528-5115

MEMBERS

April 8, 1998

AASHTO Magalie Roman Salas
AAA Secretary
AMTA Federal Communications Commission
API 1919 "M" Street, Room 200
ATA Washington, D.C. 20554

Re: **Ex Parte Notification**
PR Docket No. 92-235

RECEIVED

APR - 8 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Roman Salas:

The Land Mobile Communications Council ("LMCC"), pursuant to Section 1.2106(b)(1) of the Commission's rules, hereby notifies the Commission that on April 7, 1998, the attached memorandum was submitted to Karen Gulick, legal advisor to Commissioner Tristani, and Peter Tenhula, legal advisor to Commissioner Powell. Please include this memorandum in the record of the above referenced proceeding.

This memorandum was delivered during meetings between members of the LMCC's board of directors and Ms. Gulick and Mr. Tenhula. The purpose of these meetings was to introduce the Commission to the LMCC.

If you have any questions please do not hesitate to contact me at your convenience.

Sincerely,

Mark E. Crosby
Secretary Treasurer

CTIA
CSAA
FIT
FCCA
ITA
ITSA
IAFC
IAFWA
IMSA
ITLA
MRFAC
NASF
PCIA
TIA
UTC

No. of Copies rec'd
List A B C D E

021

LAND MOBILE COMMUNICATIONS COUNCIL

Presentation of

REFARMING ISSUES OUTSTANDING

(PR Docket No. 92-235)

◆ Background

- In an effort to alleviate the extreme congestion on the Private Land Mobile Radio ("PLMR") bands below 800 MHz, the Commission initiated the so-called "refarming" proceeding in 1992. The goal of this proceeding is to develop an overall strategy for using PLMR spectrum more efficiently in order to meet the growing demands of the private wireless community.
- This rule making proposed a two-fold strategy. 1) Consolidate the 20 individual radio services into two broad pools -- Public Safety and Industrial/Business. 2) Migrate all incumbent licensees to "narrowband" channels through a system of type acceptance -- over time, the Commission will only type-accept spectrally efficient narrowband equipment.
- To date, the Commission has implemented the first phase of the narrowband transition (*Memorandum Opinion and Order*, rel. December 30, 1996) and completed the pool consolidation (*Second Report and Order*, rel. March 12, 1997). However, a number of crucial issues remain before the Commission on reconsideration.

◆ Low Power Pool

- To maximize the benefit of the transition to narrowband channels, the Commission has decided to license narrowband systems on the "offsets" 12.5 kHz removed from existing regularly assignable 25 kHz channels. However, in the bands between 450-470 MHz these offsets are currently occupied by low power licensees. To prevent the dislocation of these low power incumbents, the Commission requested that its Certified Frequency Advisory Committees submit a plan for the accommodation of low power users.

This plan, submitted to the Commission by the Land Mobile Communications Council ("LMCC") on June 4, 1997, identified 104 channels that would be reserved for low power use and added technical flexibility to the rules governing low power operation.

♦ Trunking

- In addition to the transition to narrowband channels, the Commission proposes to increase spectrum efficiency by permitting the deployment of trunking technology in the bands below 800 MHz. This technology permits a licensee to select an unoccupied channel by monitoring several channels at once and dramatically increases spectral efficiency.
- However, the trunking rules the Commission proposed in the *Second Report and Order* have been subject to numerous petitions for reconsideration from nearly all segments of the PLMRS industry. The Commission should act as quickly as practicable to implement a workable trunking plan.

♦ LMCC filings in the Refarming Proceeding

1. March 4, 1998, Letter to Dan Phythyon: Proposed clarification of trunking rules.
2. January 30, 1998, Letter to Dan Phythyon: Clarification of low power channel aggregation and the implementation of spectrally-efficient low power equipment. Request for low power pool resolution.
3. November 24, 1997, Letter to Dan Phythyon: Request for FCC database update. Request for clarification of incumbent low power licensee migration and resolution of the low power pool.
4. September 10, 1997, Letter to Dan Phythyon: Report on Frequency Advisory Committee consensus on 470-512 MHz coordination procedures.
5. August 21, 1997, Letter to Dan Phythyon: Refarming implementation proposal; draft *Public Notice* announcing time line for acceptance of applications for 470-512 MHz, low power migration, and 450-470 MHz narrowband systems.
6. July 15, 1997, Letter to Dan Phythyon: Report on inter-coordination notification and database updates.
7. June 4, 1997, Letter to Dan Phythyon: Submission of LMCC Low Power Pool Consensus Plan.